

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TONYA PARKS, individually
BENNIE GIBSON, individually
FRANCES GIBSON, individually
NYANZA COOK, individually
ALEXANDER BEDNAR, individually

PLAINTIFFS

v.

CASE NO. 5:23-CV-00041

AIG, an insurance company based in New York
CHICAGO TITLE, a California Company
TIMOTHY HENDERSON, a removed
Oklahoma Judge accused of crimes,
DAVID PRATER, Oklahoma County District
Attorney in his individual and official capacity
MIKE HUNTER, individually
MELISSA ABERNATHY, sheriff deputy
BRETT SLIMP, sheriff deputy
OKLAHOMA COUNTY

DEFENDANTS

**MOTION TO WITHDRAW AND FOR ADDITIONAL TIME
TO FILE MOTION TO AMEND**

Attorneys Ronnie Musgrove and Atefah Eva Borghei (collectively “Counsel”) move to withdraw as counsel of record for the Plaintiffs Tonya Parks, Bennie Gibson, Frances Gibson, Nyanza Cook, and Alexander Bednar. In conjunction with this motion, Counsel request that the Court the deadline for the Plaintiffs’ motion to amend the complaint until twenty-one (21) days following the date on which counsel is allowed to withdraw. In support of the motion, Counsel states:

(1) On June 20, 2024, the Court entered an order that, among other things, dismissed many of the Plaintiffs’ claims without prejudice. The Court allowed that

Plaintiffs could file a motion to amend their complaint within twenty-one days, or July 11, 2024. (ECF [112], at 16).

(2) Since that order, professional considerations have arisen that require Counsel to make this request to withdraw.

(3) Counsel respectfully requests that, in view of those considerations, Counsel be allowed to withdraw, and that Plaintiffs be allowed to proceed *pro se* or otherwise engage new counsel.

(4) So that Plaintiffs will not be prejudiced, Counsel requests that the deadline for filing a motion to amend be extended for twenty-one (21) additional days after the Court permits Counsel to withdraw.

(5) Pursuant to Local Civil Rule 83.5, Counsel has given notice to the Plaintiffs of their intent to withdraw and to counsel for the other parties that have appeared in the case.

(6) Counsel for the State Defendants, County Defendants, and Chicago Title have no objection to this motion to withdraw.

(7) Consistent with Local Rule 7.1(h), Counsel are submitting a proposed order for the Court's consideration, which is also attached to this motion as exhibit 1.

(8) Counsel will email a copy of this motion and the proposed order to the Plaintiffs. Until Counsel is permitted to withdraw, Counsel will provide notice of any filings directly to the Plaintiffs.

Dated: July 2, 2024.

Respectfully submitted,

/s/ Ronnie Musgrove
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CERTIFICATE OF SERVICE

I, Ronnie Musgrove, certify that I have this day filed the foregoing pleading or other paper with the ECF system, which sent notification of such filing to all counsel of record.

/s/ *Ronnie Musgrove*